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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

United States of America

vs.

James B. Panther, Jr.,  
a/k/a “James Suqui” and “James  
Suquilanda,”

Defendant.

Case No. CR-19-00448-PHX-DLR-2

**JOINT MOTION TO CONVERT  
RULE 11 HEARING TO A STATUS  
CONFERENCE**

The undersigned parties, by their respective attorneys, hereby submit this motion to convert the Rule 11 hearing currently scheduled for September 11, 2020 to a status conference and an accompanying proposed order for the Court’s consideration.

On May 4, 2020, the parties notified the Court of the defendant’s intent to enter a plea of guilty. On July 14, 2020, the parties jointly sought a continuance of the Rule 11 plea hearing and trial, then scheduled for July 21, 2020, and August 4, 2020, respectively. On July 15, 2020, the Court entered an order moving the plea hearing to September 11, 2020, and the trial to October 6, 2020.

Since the date of filing, the government has continued reviewing electronic materials in its possession. In addition, the government is processing and reviewing

physical materials located at the United States Attorney's Office for the Southern District of Florida that are related to another case and which may contain information discoverable in the instant matter. The government is diligently analyzing all of the above files for any additional discoverable materials and information, which it intends to make available to the defendant. Given that the government's review is ongoing and, in particular, that the government's ability to physically review the off-site materials is limited by constraints arising from the COVID-19 pandemic, the parties request that this Court convert the Rule 11 hearing currently scheduled for September 11, 2020 to a status conference to apprise the Court of any additional updates and discuss setting a date for the plea hearing and trial.

Respectfully submitted,

FOR PLAINTIFF  
UNITED STATES OF AMERICA

FOR DEFENDANT  
JAMES B. PANTHER, JR.

By: s/Michelle Pascucci  
Michelle Pascucci, Trial Attorney  
Brittain Shaw, Trial Attorney

By: s/Dennis Burke  
Dennis Burke, Esq.  
Mark Kokanovitch, Esq.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on August 10, 2020, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send notification to counsel of record.

Respectfully submitted,

BY: /s/ Michelle Pascucci